

September 6, 2019

**VIA ECFS**

Marlene Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, S.W.  
Washington, DC 20554

**Re: WC Docket No. 19-239 - SUPPLEMENT**

Dear Ms. Dortch:

At the request of Commission staff, E. Ritter & Company ("Transferor") and Ritter Communications Ultimate Holdings LLC ("Transferee") submit this letter to supplement their domestic section 214 application in the above-referenced proceeding to transfer control of direct subsidiary E. Ritter Communications Holdings Inc. and the wholly-owned subsidiaries of E. Ritter Communications Holdings Inc.

First, Transferor identifies the geographic areas where its subsidiaries operate as an Incumbent Local Exchange Carrier ("ILEC") or a Competitive Local Exchange Carrier ("CLEC") and for the ILEC subsidiaries, the approximate access lines served.

E. Ritter Telephone Company ("Ritter Telephone"), an ILEC,<sup>1</sup> serves the following Arkansas communities in LATA 528: Dyess, Etowah, Keiser, Lepanto, Marked Tree, Oak Acres, Payneway, and Tyronza. Ritter Telephone has approximately 2,093 access lines.

Tri-County Telephone Company, Inc. ("Tri-County"), an ILEC,<sup>2</sup> serves the following Arkansas communities in LATA 528: Alpena, Compton, Deer, Jasper, Lurton, Mount Judea, Osage, Ponca, Saint Joe, and Western Grove. Tri-County has approximately 5,173 access lines.

Millington Telephone Company, Inc. ("Millington"), an ILEC,<sup>3</sup> serves the following Tennessee communities in LATA 468: Drummonds, Mason, Millington, Munford, Rosemark, Shelby Forest, and Stanton. Millington has approximately 12,615 access lines.

E. Ritter Communications, Inc. ("Ritter Communications"), a CLEC, serves approximately 170 communities in Arkansas and the following communities in Tennessee and Texas: Burlison, Cordova, Covington, Eads, Frayser, Germantown, Lauderdale County, and Somerville, TN; Allen and Texarkana, TX.

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<sup>1</sup> E. Ritter Communications Holdings, Inc., on behalf of its wholly owned subsidiary E. Ritter Telephone Company, elected A-CAM support in Arkansas. See Public Notice, DA 19-349 (rel. Apr. 29, 2019).

<sup>2</sup> E. Ritter Communications Holdings, Inc., on behalf of its wholly owned subsidiary Tri-County Telephone Company, Inc., elected A-CAM support in Arkansas. See Public Notice, DA 19-349 (rel. Apr. 29, 2019).

<sup>3</sup> E. Ritter Communications Holdings, Inc., on behalf of its wholly owned subsidiary Millington Telephone Company, Inc., elected A-CAM support in Tennessee. See Public Notice, DA 19-808 (rel. Aug. 22, 2019).

Second, Transferee identifies the two other agreements for transfer of control of other communications providers subject to the Commission's jurisdiction as mentioned in footnote 6 of the Application. The first agreement relates to the transfer of control of Summit Vista Inc. and its wholly-owned subsidiary Orlando Telephone Company, Inc. d/b/a Summit Broadband. See WC Docket No. 19-245. The second agreement relates to the transfer of control of Hunter Communications, Inc., for which an application was filed with the Commission on September 5, 2019.

Finally, Transferor and Transferee clarify that the pending application is eligible for streamlined processing pursuant to Section 63.03(b)(2)(iii). Transferor's operating subsidiaries include two ILECs serving Arkansas communities, one ILEC serving Tennessee communities, and one CLEC serving Arkansas, Tennessee and Texas communities. Transferee does not provide telecommunications services but is affiliated with Great Plains Communications LLC, an ILEC<sup>4</sup> that serves communities in Nebraska, Colorado, Kansas, and South Dakota; Great Plains Broadband, LLC, a CLEC that serves communities in Nebraska; and InterCarrier Networks, LLC, a CLEC, serving communities in Illinois and Indiana. Upon completion of the proposed transaction, Transferee will have a market share in the interstate, interexchange market of less than 10%, Transferee's affiliates that provide local exchange services are not a party to the pending transaction, all of the ILECs described herein are "independent" incumbent local exchange carriers as defined in Section 64.1902 and the independent ILECs, in combination, have fewer than 2% of the nation's subscriber lines installed in the aggregate nationwide and no overlapping or adjacent service areas.

Should you have any questions concerning this information, please do not hesitate to contact the undersigned.

Respectfully submitted,

**RITTER COMMUNICATIONS ULTIMATE  
HOLDINGS LLC**

**E. RITTER & COMPANY**

/s/

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Cc (via email): Jodie May, FCC  
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<sup>4</sup> Great Plains Communications, Inc. elected A-CAM support in Nebraska. See Public Notice, DA 19-349 (rel. Apr. 29, 2019).